1 STEVEN G. KALAR Federal Public Defender CARMEN A. SMARANDOIU Assistant Federal Public Defender 450 Golden Gate Avenue San Francisco, CA 94102 Telephone: 415.436.7700 415.436.7706 Facsimile: 5 Carmen Smarandoiu@fd.org 6 Counsel for Defendant Francisco Javier Madrid Lopez 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA 9 SAN FRANCISCO DIVISION 10 11 United States of America. Case Number: CR 14-00038 MEJ Defendant's Travel Request [Proposed] Order 12 Plaintiff. 13 14 Francisco Javier Madrid Lopez, 15 Defendant. 16 17 On January 15, 2015, defendant Francisco Javier Madrid Lopez was sentenced to three years' 18 probation in case CR 14-00038 MEJ for Assimilating California Penal Code § 25400(a)(1), Carry a 19 Concealed Weapon. Since then, there have been no reported violations of his conditions of probation. 20 On February 1, 2016, Mr. Madrid sought the modification of his current conditions of 21 probation to permit him travel for pleasure to Costa Rica from February 5, 2016, until February 22 19, 2016, for a belated honeymoon vacation. *See* Docket No. 72 (filed Feb. 1, 2016). The Court 23 granted permission on the same day. *See* Docket No. 73 (filed Feb. 1, 2016). 24 25 // 26 // 27 Def.'s Travel Request; [Prop.] Order 28 CR 14-00038 MÉJ 1

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Unfortunately, Mr. Madrid and his wife were unable to follow through with their travel 1 2 plans due to work scheduling conflicts and had to reschedule their belated honeymoon trip. 3 Accordingly, Mr. Madrid respectfully requests that the Court grant him permission to travel from March 13, 2016 to March 23, 2016. 4 5 Undersigned counsel has contacted Mr. Madrid's Probation Officer, Ms. Shaheen Shan, and Assistant United States Attorney William Edelman. Probation Officer Shan's approval is pending 6 completion of a home visit at Mr. Madrid's new residence. AUSA Edelman concurs. 7 8 Dated: March 9, 2016 9 Respectfully submitted, 10 <u>/s/ Carmen A. Smarandoiu</u> CARMEN A. SMARANDOIU 11 Assistant Federal Public Defender 12 13 14 [Proposed] ORDER 15 For the reasons stated, the Court permits FRANCISCO JAVIER MADRID LOPEZ to travel to 16 17 Costa Rica from March 13, 2016, until March 23, 2016. 18 SO ORDERED. 19 March 9, 2016 Dated: 20 Maria-Elena ames 21 United States Magistrate Judge 22 23

Def.'s Travel Request; [Prop.] Order CR 14-00038 MEJ

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